

CONNECTICUT REPUBLICANS

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2010 OCT 26 AM 10:28

RECEIVED
FEDERAL ELECTION
COMMISSION

October 22, 2010

VIA CERTIFIED MAIL

Christopher Hughey, Esq.
Acting General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

MUR# 6410

Re: Complaint Against Richard Blumenthal, Blumenthal for Senate, and Planned Parenthood

Dear Mr. Hughey:

This letter constitutes a formal complaint filed pursuant to 2 U.S.C. §437g(a)(1) against Richard Blumenthal, the Democratic nominee for United States Senate in Connecticut, Blumenthal for Senate ("Blumenthal Campaign"), Mr. Blumenthal's principal campaign committee, and Planned Parenthood's lobbying and political arm, Planned Parenthood Action Fund, Inc ("Planned Parenthood"), a qualified nonprofit corporation. Based upon information and belief, set forth below and in the attached materials, the Connecticut Republicans Party files this complaint seeking an immediate and thorough investigation by the Federal Election Commission ("FEC" or "Commission") into the various public communications in which the Blumenthal Campaign and Planned Parenthood may have coordinated.

I. Factual Background

On October 22, 2010, Marcy Stech, a Blumenthal Campaign press staffer, sent an email to several other Blumenthal Campaign staffers stating, "Grossman is looking for misogynistic [sic] photos of women and WWE. Planned Parenthood wants to hit LM hard on it. What do we got?" See Email from Marcy Stech (Oct. 22, 2010) (emphasis added) (attached as Exhibit 1); see also Ben Smith, Blumenthal and Planned Parenthood Seek 'Worst of WWE + Women Photos,' *Politico*, Oct. 22, 2010, http://www.politico.com/blogs/bensmith/1010/Blumenthal_and_Planned_Parenthood_seek_Worst_of_WWE_women_photos.html (attached as Exhibit 2).

The "Grossman" referenced in the email is Andrew Grossman, a Democratic consultant who, upon information and belief, is an agent of Planned Parenthood and so heavily involved in the organization's political strategy that earlier this year he recruited and selected Planned Parenthood's Political and Organizing Director. See Position Description: Political and Organizing Director, Planned Parenthood Federation of America, <http://www.grossmansolutions.com/PPFA.pdf> (attached as Exhibit 3).

321 Ellis Street • Bldg 17 Unit 501 • New Britain, CT 06051

Telephone: (860) 826-7378 • Fax: (860) 826-2742 • Website: www.ctgop.org

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II. There is Reason to Believe That Planned Parenthood is Illegally Coordinating Public Communications with the Blumenthal Campaign

When an outside organization, such as Planned Parenthood, makes an expenditure for a public communication that is coordinated with a candidate or candidate's campaign committee, the communication is an in-kind contribution to the candidate and is subject to the Federal Election Campaign Act's contribution limits and source prohibitions. See 11 C.F.R. § 109.20. When the outside organization, such as Planned Parenthood, makes such coordinated communications and raises and spends funds outside of the contribution limits, source prohibitions, and reporting requirements of the Act, the communication is also a prohibited corporate in-kind contribution to the candidate. See 2 U.S.C. §441b; see also 11 C.F.R. § 109.22.

The Commission's coordination regulations set forth five ways in which the conduct of a candidate and an outside organization may result in a prohibited coordinated communication. Relevant here are the following two standards:

Request or Suggestion. The conduct prong is met if the person creating, producing, or distributing the communication does so at the request or suggestion of a candidate, authorized committee, or any agent thereof; or if the person paying for the communication suggests the creation, production, or distribution of the communication to the candidate, authorized committee, or any agents thereof, and the candidate assents to the suggestion. See 11 C.F.R. §109.21(d)(1).

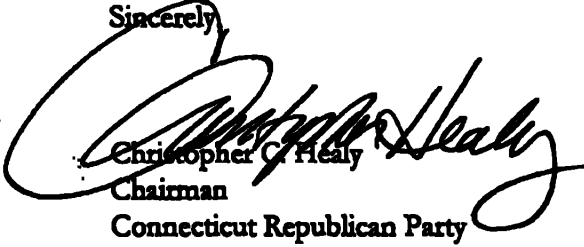
Material Involvement. The conduct prong is met if a candidate, authorized committee, or any agents thereof, are "materially involved" in the decisionmaking regarding the: (1) content of the communication; (2) intended audience; (3) means or mode of the communication; (4) specific media outlet used; (5) timing or frequency of the communication; or (6) size or prominence of a printed communication or duration of a communication by means of broadcast, cable, or satellite. See 11 C.F.R. §109.21(d)(2).

As set forth in the facts above, the Blumenthal Campaign and Planned Parenthood's actions meet both of these coordination conduct standards. Mr. Grossman, an agent of Planned Parenthood, reached out to Ms. Stech, a Blumenthal Campaign staffer, and specifically asked for the Blumenthal Campaign to assist him in finding images to use in a communication opposing Linda McMahon, Blumenthal's opponent. Mr. Grossman, as Planned Parenthood's agent, suggested that Planned Parenthood create, produce, or distribute a communication and the Blumenthal Campaign assented by willingly looking for images to provide to Planned Parenthood. By assisting Mr. Grossman in finding images for the communication, the Blumenthal Campaign was also materially involved in the content of the communication.

Finally, Planned Parenthood recently began an independent expenditure campaign in opposition to Linda McMahon, Mr. Blumenthal's opponent. As evidenced by the coordinated conduct above, there is reason to believe that the Blumenthal Campaign and Planned Parenthood may have coordinated past public communications and may be continuing to coordinate future public communications. Accordingly, the Connecticut Republican Party urges the Commission conduct an immediate and thorough investigation into the entire range of public communications in which the Blumenthal Campaign and Planned Parenthood may have illegally coordinated and impose the maximum penalty under the Act for any legal violations that occurred.

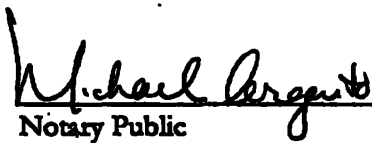
The above is correct and accurate to the best of my knowledge, information, and belief.

Sincerely,


Christopher C. Healy
Chairman
Connecticut Republican Party

Attachments

SWORN TO AND SUBSCRIBED before me on this 22nd day of October, 2010.

 Attest
Notary Public

My commission expires:

MICHAEL ARGENTO
NOTARY PUBLIC
MY COMMISSION EXPIRES AUG 31, 2012

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Exhibit 2

11044300502

POLITICO



BEN SMITH

A running conversation about politics

October 22, 2010

Categories:
2010

Blumenthal and Planned Parenthood seek 'Worst of WWE + women photos'

A source this morning forwards on an e-mail this morning from inside Attorney General Dick Blumenthal's campaign for Senate, in which his aides discuss tarring Linda McMahon in cooperation with Planned Parenthood.

The e-mail's subject line is: "Worst of WWE + women photos."

"Hey all — Grossman is looking for misogynistic photos of women and WWE. Planned Parenthood wants to hit LM hard on it," press staffer Marcy Stech e-mailed seven other aides to the campaign and the State Democratic Party. "What do we got?"

"Grossman" is the Democratic consultant Andrew Grossman, and the e-mail seems to raise the question of whether the campaign is coordinating with Planned Parenthood, an outside group.

Blumenthal spokesman Ty Matsdorf said there's no coordination and that the request was simply for an image that would be circulated on Twitter or in a press release, but not in a paid ad campaign of any sort.

"Her tenure at the WWE is offensive to all people, but especially to women," he said. (Today's flap

Advertisement

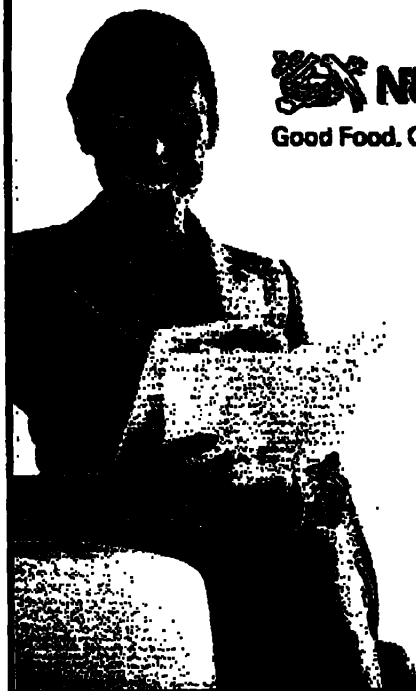
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POLITICO

is Rick Santorum's comparing the WWE to rape victims.)

A spokesman for Linda McMahon, Ed Patru, accused Blumenthal of crossing the line.

"This is clear evidence that Dick Blumenthal's campaign is 110 percent in the gutter, orchestrating a potentially illegal coordinated campaign to dig up dirt on women for the purposes of attacking another woman. It's utterly appalling that this is what Blumenthal's campaign is focused on while nearly 10 percent of the state is unemployed," he said in an e-mail.

The full e-mail is after the jump.

Subject: Worst of WWE + women photos

Date: Fri, 22 Oct 2010 13:50:

From: [Marcy Stech]

To: Catherine Algeri, Pat McHugh, Brian Farnkoff, Dan Morrocco, Jon Donnenberg, Ty Matsdorf, Kate Hansen

Hey all — Grossman is looking for misogynistic photos of women and WWE. Planned Parenthood wants to hit LM hard on it.

What do we got?

Sent from my Verizon Wireless BlackBerry

Posted by Ben Smith 12:35 PM

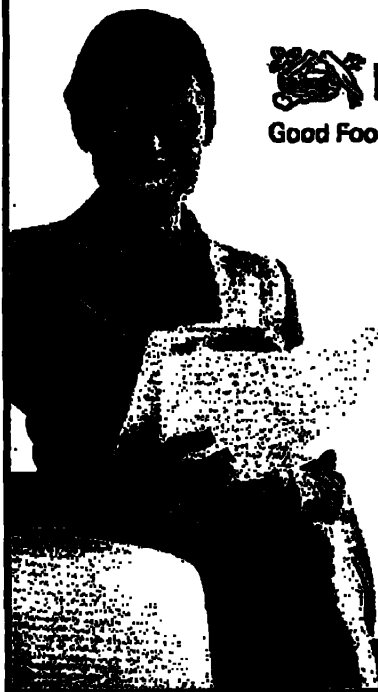
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Exhibit 3



**Position Description
Political and Organizing Director
Planned Parenthood Federation of America**

Planned Parenthood Federation of America (PPFA) is seeking a dynamic, innovative and experienced Political and Organizing Director to lead the organizing and political efforts of PPFA, Planned Parenthood Action Fund and Planned Parenthood Federal PAC to strengthen and build the national movement in support of women's health care services.

PPFA – THE ORGANIZATION

PPFA is the nation's leading sexual and reproductive health care provider and advocate. PPFA also works with partner organizations worldwide to improve the sexual health and well-being of individuals and families everywhere. PPFA has 89 independent local affiliates that operate more than 840 health centers throughout the United States, providing high-quality services to women, men, and teens. Planned Parenthood often is the only source of health care for a large proportion of the women we serve.

PPFA's Clients

PPFA affiliates provide sexual and reproductive health care, education, and information to five million women, men, and adolescents worldwide each year. More than three million women and men in the United States annually visit Planned Parenthood affiliate health centers for trusted health care services and information. One in four women in the U.S. has visited a Planned Parenthood health center at least once in her life.

PPFA's Work

- Planned Parenthood health centers focus on prevention: 82 percent of our clients receive services to prevent unintended pregnancy.
- Planned Parenthood services help prevent more than 621,000 unintended pregnancies each year.
- Planned Parenthood provides nearly one million Pap tests and more than 850,000 breast exams each year, critical services in detecting cancer.
- Planned Parenthood provides more than 3.3 million tests and treatments for sexually transmitted infections, including HIV.
- Three percent of all Planned Parenthood health services are abortion services.
- Planned Parenthood affiliates provide educational programs to more than 1.2 million young people and adults each year.

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- Planned Parenthood has more than four million activists, supporters, and donors working for women's health and safety and our fundamental reproductive rights.

For more information about PPFA, please visit www.plannedparenthood.org.

POSITION DESCRIPTION

The Political and Organizing Director oversees the organizing and political efforts of PPFA and Planned Parenthood Action Fund (PPAF), including electoral activities conducted by the Action Fund and Planned Parenthood Federal PAC. A key member of the senior management team, the incoming Political and Organizing Director will strengthen and build the movement in support of women's health services nationally and at state and local levels. The Political and Organizing Director will identify and organize a new generation of members and supporters, educating them about the politics of women's health care, and building a powerful organization that will support the goals of PPFA to ensure that all women have access to the health services they require. The Political and Organizing Director will also be a primary contact for PPFA's relationships with candidates and party committees.

The Political and Organizing Director is responsible for planning and coordinating all PPFA field activities in support of legislative and electoral goals in coordination with other departments across the organization. Additionally, the Political and Organizing Director collaborates with PPFA affiliates on the national political and organizing program, and works with outside consultants in support of the program.

The long-term goals for the Political and Organizing Director will include sustaining an ongoing organizing campaign and building a nationwide field organization that will:

- Advance the political and policy goals of PPFA and the reproductive health and rights movement, both offensive and defensive;
- Design and execute organizing campaigns and leadership efforts that build support among and engage the next generation of activists;
- Integrate grassroots and grassroots leaders in campaigns to advance state and federal policy goals;
- Work with Planned Parenthood affiliate staff and volunteers to deepen their organizing skills and political engagement;
- Identify and plan for long term electoral and issue priorities, while also being responsive to immediate opportunities and challenges;
- Develop programs and campaigns that can be used with the funding community, including major donors and foundations; and,
- Grow the PPAF and PPFPAC political program both nationally and in the states.

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The ideal candidate will be a person who:

- will be the connective tissue from the identification of an issue that is important organizationally to its transition into action;
- has a strategic vision and plan and the ability to communicate them to PPFA affiliates, coalition partners, board and donors;
- can plan and drive the work with the affiliates;
- has the ability to work with the affiliate structure with its particular range of strengths and challenges;
- will serve as a gateway to resources for affiliates and other departments inside the organization;
- brings technical expertise and campaign and organizing experience to the role;
- understands and is able to use data to shape and direct programming, capitalizing on the strong organizational investment in lists, data, modeling and scoring; and,
- can move information up and down the organizational ladder and cross-divisionally within the organization.

DUTIES AND RESPONSIBILITIES

The Political and Organizing Director leads the development, implementation and evaluation of broad organizing and political strategies and objectives and ensures that these activities are integrated into the work performed by other departments, divisions and affiliates. A senior leader in the Public Policy and Advocacy Department, the Political Director reports to the Vice President for Public Policy and Advocacy in Washington, D.C. In addition, the Political and Organizing Director works directly with the Senior Management Team and PPEA President through weekly meetings to coordinate across divisions. The Political and Organizing Director is a primary resource for the staff and board in all matters related to organizing and politics.

The Political and Organizing Director hires, trains, supervises and evaluates the professional staff in the Political Department and oversees the work of vendors, consultants and outside contractors. The Political and Organizing Director develops departmental budgets and collaborates with PPFA's Finance Division to monitor the budget, oversee expenses and disbursements, and ensure compliance with reporting and disclosure requirements. The Political and Organizing Director supervises and coordinates the training and grassroots mobilization of diverse individuals through the federation, including more than 85 state based affiliates.

Additionally, the Political and Organizing Director:

- Collaborates with the Development Division to create strategies, develop materials and communicate with donors, including participation in direct solicitation, in support of advocacy and electoral programs;

- Reviews and analyzes political and policy issues -- mobilizing rapid responses to critical and controversial issues when necessary -- and communicates programmatic progress to national staff, national PPFA and Action Fund boards, and affiliates through reports, email, meetings and presentations;
- Oversees the Planned Parenthood Federal PAC including all candidates' meetings, endorsements, contributions to candidates, fundraising for candidates and in kind contributions;
- Oversees the coordination of training and technical assistance to state and local Planned Parenthood organizations, including affiliated (c) (4) organizations, to assure maximum impact of their legislative, policy and electoral programs;
- Develops and directs an internal strategy to educate staff and volunteers throughout the organization about political and advocacy activity;
- Works as a liaison and strategic partner with other departments, divisions and affiliates to make best use of organizational resources;
- Represents PPFA and the PPAF with other non-profit and political organizations, including public speaking and other opportunities to advance the mission;
- Develops and maintains a broad range of important professional contacts to advance the goals of PPFA, actively seeking new contacts to expand PPFA's role on the national and international stage;
- Promotes an organizational culture that embraces diversity as a core value -- guiding strategic planning, program implementation and evaluation, staffing and internal and external relationships.

POSITION REQUIREMENTS

Education: Bachelor's Degree; additional related college courses or professional training is desirable.

Experience: Ten years of directly related, progressively responsible work experience in policy advocacy, organizing and electoral campaigns including project management, supervisory and management experience. Previous experience as a senior staff member for a national advocacy organization or labor union is a plus.

Related Skills or Knowledge: Extensive knowledge of policy and electoral politics; ability to analyze field trends and practices to develop cutting-edge strategies on a national level and negotiate complex policy discussions to broker consensus among various constituencies. Computer literacy including spreadsheet and online technology skills. Excellent verbal and written communications and problem resolution skills.

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Other Requirements: Knowledge of diverse groups and working with a multicultural workforce and sensitivity to cultural differences. In keeping with the nature of work, candidates must be able to travel, as well as work long and irregular hours.

To apply, send an email with a cover letter detailing your qualifications, resume, and salary requirements to jobsearch@grossmansolutions.com. Resumes will be accepted until May 3, 2010.

Planned Parenthood Federation of America is an equal employment opportunity employer and is committed to maintaining a non-discriminatory work environment. Planned Parenthood of America does not discriminate against any employee or applicant for employment on the basis of race, color, religion, sex, national origin, age, disability, veteran status, marital status, sexual orientation, or any other characteristic protected by applicable law. Planned Parenthood Federation of America is committed to creating a dynamic work environment that values team work, collaboration, creativity, and building a diverse team.

GROSSMAN SOLUTIONS

11044300510

11044300511

Exhibit 4



FEC FORM 5

REPORT OF INDEPENDENT EXPENDITURES MADE AND CONTRIBUTIONS RECEIVED

FILING FEC-501605

1. Planned Parenthood Action Fund Inc.

434 West 33rd Street
New York, NY 10001

2. Filer Information

This Filer IS a Qualified Nonprofit Corporation.

3. FEC Committee ID #: C90005471

- 4. (a) Type Of Report: 24-Hour Report**
(b) This Report Is NOT An Amendment

5. Covering Period: Through

ITEMIZED INDEPENDENT EXPENDITURES

6. Total Contributions: 0.00

7. Total Independent Expenditures: 127863.89

Completed By: Dara Klassel
Date Signed: 10/15/2010

(End FEC FORM 5)

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SCHEDULE 5-E

ITEMIZED INDEPENDENT EXPENDITURES

FILING FEC-501605

Committee: PLANNED PARENTHOOD ACTION FUND INC.

The Watershed Group

100 Bush Avenue Suite 350
San Francisco, California 94104

Expenditure Description: Email consulting
Date Expended = 10/07/2010
In OPPOSITION to Christine O'Donnell

Amount Expended = 205.00
Calendar YTD Per Election for Office Sought = 547.45

The Watershed Group

100 Bush Avenue Suite 350
San Francisco, California 94104

Expenditure Description: Email consulting
Date Expended = 10/07/2010
In OPPOSITION to Sharron Angle

Amount Expended = 205.00
Calendar YTD Per Election for Office Sought = 9643.44

Mack Crounse Group

2001 N Beauregard Street Ste 420
Alexandria, Virginia 22311

Expenditure Description: Production and postage for political mail
Date Expended = 10/13/2010
In OPPOSITION to Joe Heck

Amount Expended = 6564.20
Calendar YTD Per Election for Office Sought = 13163.75

Mack Crounse Group

2001 N Beauregard Street Ste 420
Alexandria, Virginia 22311

Expenditure Description: Production and postage of political mail
Date Expended = 10/13/2010
In OPPOSITION to Sharron Angle

Amount Expended = 4597.92
Calendar YTD Per Election for Office Sought = 9643.44

Mundy Katowitz Media Inc

1322 G Street SE
Washington, DC 20003

Expenditure Description: Media purchase
Date Expended = 10/14/2010
In OPPOSITION to Dean P Scontras

Amount Expended = 29236.00
Calendar YTD Per Election for Office Sought = 40793.35

LKK Partners

4301 Conneticut Ave NW Ste 434
Washington, DC 20008

Expenditure Description: Production of TV ad
Date Expended = 10/14/2010
In OPPOSITION to Dean P Scontras

Amount Expended = 4643.75
Calendar YTD Per Election for Office Sought = 40793.35

Mack Crounse Group

2001 N Beauregard Street Ste 420
Alexandria, Virginia 22311

Expenditure Description: Production and postage for political mail
Date Expended = 10/15/2010
In OPPOSITION to Roy Blunt

Amount Expended = 20650.00
Calendar YTD Per Election for Office Sought = 20890.35

Part and Parcel

18 Bridge Street Ste 3E
Brooklyn, New York 11201

Expenditure Description: On-line voter guide
Date Expended = 09/27/2010
In OPPOSITION to Roy Blunt

Amount Expended = 13.60
Calendar YTD Per Election for Office Sought = 20890.35

Mack Crounse Group

2001 N Beauregard Street Ste 420
Alexandria, Virginia 22311

Expenditure Description: Production and postage for political mail
Date Expended = 10/15/2010
In OPPOSITION to Kenneth Buck

Amount Expended = 27000.00
Calendar YTD Per Election for Office Sought = 100914.47

Mack Crounse Group

2001 N Beauregard Street Ste 420
Alexandria, Virginia 22311

Expenditure Description: Production and mail for political mail
Date Expended = 10/16/2010

In OPPOSITION to Linda McMahon:

Amount Expended = 9000.00

Calendar YTD Per Election for Office Sought = 9035.35

Part and Parcel

18 Bridge Street Ste 3E
Brooklyn, New York 11201

Expenditure Description: On-line voter guide

Date Expended = 09/27/2010

In OPPOSITION to Linda McMahon

Amount Expended = 13.60

Calendar YTD Per Election for Office Sought = 9035.35

Mack Crounse Group

2001 N Beauregard Street Ste 420
Alexandria, Virginia 22311

Expenditure Description: Production and postage for political mail

Date Expended = 10/16/2010

In OPPOSITION to Dean P Scontras

Amount Expended = 6900.00

Calendar YTD Per Election for Office Sought = 40793.35

Part and Parcel

18 Bridge Street Ste 3E
Brooklyn, New York 11201

Expenditure Description: On-line voter guide

Date Expended = 09/27/2010

In OPPOSITION to Dean P Scontras

Amount Expended = 13.60

Calendar YTD Per Election for Office Sought = 40793.35

Mack Crounse Group

2001 N Beauregard Street Ste 420
Alexandria, Virginia 22311

Expenditure Description: Production and postage for political mail
Date Expended = 10/15/2010
In OPPOSITION to Sharon Angle

Amount Expended = 4557.92
Calendar YTD Per Election for Office Sought = 9643.44

Mack Crounse Group

2001 N Beauregard Street Ste 420
Alexandria, Virginia 22311

Expenditure Description: Production and postage of political mail
Date Expended = 10/15/2010
In OPPOSITION to Thomas D Ganley

Amount Expended = 7711.90
Calendar YTD Per Election for Office Sought = 7944.10

Part and Parcel

18 Bridge Street Ste 3E
Brooklyn, New York 11201

Expenditure Description: On-line voter guide
Date Expended = 09/27/2010
In OPPOSITION to Thomas D Ganley

Amount Expended = 13.60
Calendar YTD Per Election for Office Sought = 7944.10

Mack Crounse Group

2001 N Beauregard Street Ste 420
Alexandria, Virginia 22311

Expenditure Description: Production and postage for political mail
Date Expended = 10/15/2010
In OPPOSITION to Joe Heck

Amount Expended = 6564.20
Calendar YTD Per Election for Office Sought = 13163.75

Part and Parcel

18 Bridge Street Ste 3E
Brooklyn, New York 11201

Expenditure Description: On-line voter guide
Date Expended = 09/27/2010
In OPPOSITION to Joe Heck

Amount Expended = 13.60
Calendar YTD Per Election for Office Sought = 13163.75

Total of Itemized Independent Expenditures = 127863.91



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